PROPOSED TOTAL MAXIMUM DAILY LOAD (TMDL)

for

E. Coli

in the

South Fork Holston River Watershed (HUC 06010102)

Carter, Greene, Hawkins, Johnson, Sullivan, and Washington

Counties, Tennessee

DRAFT

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LIST OF ABBREVIATIONS

ADB Assessment Database
AFO Animal Feeding Operation
BMP Best Management Practices
BST Bacteria Source Tracking

CAFO Concentrated Animal Feeding Operation

CFR Code of Federal Regulations
CFS Cubic Feet per Second
CFU Colony Forming Units
DEM Digital Elevation Model

DWPC Division of Water Pollution Control

E. coli Escherichia coli

EPA Environmental Protection Agency
GIS Geographic Information System

HSPF Hydrological Simulation Program - Fortran

HUC Hydrologic Unit Code
LA Load Allocation
LDC Load Duration Curve

LSPC Loading Simulation Program in C⁺⁺

MGD Million Gallons per Day

MOS Margin of Safety

MRLC Multi-Resolution Land Characteristic
MS4 Municipal Separate Storm Sewer System

MST Microbial Source Tracking
NHD National Hydrography Dataset
NMP Nutrient Management Plan

NPS Nonpoint Source

NPDES National Pollutant Discharge Elimination System

NRCS Natural Resources Conservation Service

PCR Polymerase Chain Reaction
PDFE Percent of Days Flow Exceeded
PFGE Pulsed Field Gel Electrophoresis

Rf3 Reach File v.3 River Mile

SSO Sanitary Sewer Overflow STP Sewage Treatment Plant

SWMP Storm Water Management Program
TDA Tennessee Department of Agriculture

TDEC Tennessee Department of Environment & Conservation

TDOT Tennessee Department of Transportation

TMDL Total Maximum Daily Load

TWRA Tennessee Wildlife Resources Agency USGS United States Geological Survey

UCF Unit Conversion Factor

WCS Watershed Characterization System

WLA Waste Load Allocation

WWTF Wastewater Treatment Facility

SUMMARY SHEET

Total Maximum Daily Load for E. coli in South Fork Holston River Watershed (HUC 06010102)

Impaired Waterbody Information

State: Tennessee

Counties: Johnson and Sullivan

Watershed: South Fork Holston River (HUC 06010102)

Constituents of Concern: E. coli

Impaired Waterbodies Addressed in This Document:

Waterbody ID	Waterbody	Miles Impaired
TN06010102006T - 0200	WAGNER CREEK	5.5
TN06010102006T - 0300	CANDY CREEK	3.2
TN06010102012 – 0100	UNNAMED TRIB TO SOUTH FORK HOLSTON RIVER	2.0
TN06010102012 - 0300	UNNAMED TRIB TO SOUTH FORK HOLSTON RIVER	3.89
TN06010102012 – 0400	MORRELL CREEK	4.89
TN06010102012 - 0700	DRY CREEK	1.0
TN06010102012 - 0810	BIG ARM BRANCH	5.77
TN06010102012 – 0820	WOODS BRANCH	5.0
TN06010102012 - 0900	WEAVER BRANCH	5.9
TN060101020250 - 0900	WATERS BRANCH	1.82
TN060101020250 – 2000	LAUREL CREEK	3.8
TN06010102042 – 0200	BACK CREEK	14.1
TN06010102042 – 0400 ^a	LITTLE CREEK	0.3
TN06010102042 - 0500	CEDAR CREEK	11.8
TN06010102042 – 1000 ^b	BEAVER CREEK	11.1
TN06010102042 – 2000 ^b	BEAVER CREEK	10.5
TN060101020540 - 0800	PAINT SPRING BRANCH	1.0
TN06010102237 – 0100 ^c	BOOHER CREEK	7.2

^a Portions of this waterbody lie in another state. A TMDL has been developed by the State of Virginia for those portions of the waterbody lying within their jurisdiction. Monitoring data for the Tennessee portion of the waterbody was unavailable. Additional monitoring is recommended to allow for either development of a TMDL or delisting.

Additional monitoring is recommended to allow for either development of a TMDL or delisting.

b Portions of this waterbody lie in another state. A TMDL has been developed by the State of Virginia for those portions of the waterbody lying within their jurisdiction.

[°]TMDL could not be developed for Booher Creek. No monitoring data was available. Additional monitoring is recommended to allow for either development of a TMDL or delisting.

Designated Uses:

The designated use classifications for waterbodies in the South Fork Holston River Watershed include fish and aquatic life, irrigation, livestock watering & wildlife, and recreation.

Water Quality Targets:

Derived from State of Tennessee Water Quality Standards, Chapter 1200-4-3, General Water Quality Criteria, January, 2004 for recreation use classification (most stringent):

The concentration of the E. coli group shall not exceed 126 colony forming units per 100 mL, as a geometric mean based on a minimum of 5 samples collected from a given sampling site over a period of not more than 30 consecutive days with individual samples being collected at intervals of not less than 12 hours. For the purposes of determining the geometric mean, individual samples having an E. coli concentration of less than 1 per 100 mL shall be considered as having a concentration of 1 per 100 mL. In addition, the concentration of the E. coli group in any individual sample taken from a lake, reservoir, State Scenic River, or Tier II or III stream (1200-4-3-.06) shall not exceed 487 colony forming units per 100 mL. The concentration of the E. coli group in any individual sample taken from any other waterbody shall not exceed 941 colony forming units per 100 mL.

TMDL Scope:

Waterbodies identified on the Final 2004 303(d) list as impaired due to E. coli. TMDLs were developed for impaired waterbodies on a HUC-12 subwatershed or waterbody drainage area basis. Recently collecting water quality monitoring data were available for waterbodies that are not listed on the Final 2004 303(d) list as impaired due to E. coli.

A TMDL could not be developed for the Tennessee portion of Little Creek due to insufficient monitoring data. Additional monitoring is recommended to allow for either development of a TMDL or delisting. A TMDL could not be developed for Booher Creek (06010102237_0100). Monitoring data was available for another Booher Creek (part of 06010102012_0820). This monitoring data appeared to have been used in the assessment of Booher Creek (06010102237_0100). Additional monitoring is recommended to allow for either development of a TMDL or delisting for Booher Creek (06010102237_0100).

For Beaver Creek, the TMDL analysis was revised due to the availability of new data. This revised TMDL supersedes the Fecal Coliform TMDL approved by EPA in 2004.

Analysis/Methodology:

The TMDLs for impaired waterbodies in the South Fork Holston River Watershed were developed using a load duration curve methodology to assure compliance with the E. Coli 126 CFU/100 mL geometric mean and the 487 CFU/100 mL maximum water quality criteria for Tier II waterbodies and 941 CFU/100 mL maximum water quality criteria for non-Tier II waterbodies. A duration curve is a cumulative frequency graph that represents the percentage of time during which the value of a given parameter is equaled or exceeded. Load duration curves are developed from flow duration curves and can illustrate existing water quality conditions (as represented by loads calculated from monitoring data), how these conditions compare to desired targets, and the region of the waterbody flow regime represented by these existing loads. Load duration curves were used to determine the load

reductions required to meet desired maximum concentrations for E. coli. When sufficient data were available, load reductions were also determined based on geometric mean criteria.

Critical Conditions:

Water quality data collected over a period of 10 years for load duration curve analysis were used to assess the water quality standards representing a range of hydrologic and meteorological conditions.

Seasonal Variation:

The 10-year period used for LSPC model simulation period for development of load duration curve analysis included all seasons and a full range of flow and meteorological conditions.

Margin of Safety (MOS):

Explicit MOS = 10% of the E. coli water quality criteria for each impaired subwatershed or drainage area.

Summary of TMDLs, WLAs, & LAs for Impaired Waterbodies

			TMDL	WLAs				
HUC-12 Subwatershed	Impaired Waterbody			WWTFs ^a		Leaking	MO 4 C	LAs ^d
(06010102) or Drainage Area	Name	Impaired Waterbody ID		Monthly Avg.	Daily Max.	Collection Systems b	MS4s ^c	
			[% Red.]	[CFU/day]	[CFU/day]	[CFU/day]	[% Red.]	[% Red.]
0104 (DA)	Waters Branch	TN060101020250 - 0900	>79.9	NA	NA	NA	>81.9	>81.9
0104 (DA)	Laurel Creek	TN060101020250 - 2000	>79.9	NA	NA	NA	>81.9	>81.9
0302 (DA)	Painter Springs Branch	TN060101020540 - 0800	>61.1	NA	NA	NA	>65.0	>65.0
0401	Unnamed Trib to South Fork Holston River	TN06010102012 - 0300	>61.1	NA	NA	NA	>65.0	>65.0
	Morrell Creek	TN06010102012 - 0400	>79.9	NA	NA	NA	>81.9	>81.9
0402 (DA)	Unnamed Trib to South Fork Holston River	TN06010102012 - 0100	>45.2	NA	NA	NA	>50.6	>50.6
0402 (DA)	Big Arm Branch	TN06010102012 - 0810	>79.9	NA	NA	NA	>81.9	>81.9
0402 (DA)	Dry Creek	TN06010102012 - 0700	>61.1	NA	NA	NA	>65.0	>65.0
0402 (DA)	Woods Branch	TN06010102012 - 0820	34.5	NA	NA	NA	41.1	41.1
	Candy Creek	TN06010102006T - 0300	>54.6	NA	NA	NA	>59.1	>59.1
0403	Wagner Creek	TN06010102006T - 0200	>61.1	1.669x10 ⁸	1.247x10 ⁹	NA	>65.0	>65.0
	Weaver Branch	TN06010102012 - 0900	>49.7	NA	NA	NA	>54.7	>54.7

Summary of TMDLs, WLAs, & LAs for Impaired Waterbodies (cont'd)

		Impaired Waterbody ID		WLAs				
HUC-12 Subwatershed (06010102)	Impaired Waterbody Name		TMDL	WWTFs ^a		Leaking Collection	MS4s ^c	LAs ^d
or Drainage Area				Monthly Avg.	Daily Max.	Systems b	IVI345	
			[% Red.]	[CFU/day]	[CFU/day]	[CFU/day]	[% Red.]	[% Red.]
	Back Creek	TN06010102042 – 0200	>44.6	2.861x10 ⁷	2.137x10 ⁸	0	>50.1	>50.1
0502	Beaver Creek	TN06010102042 - 1000	>59.7	1.431x10 ⁷	1.069x10 ⁸	0	>63.7	>63.7
0502	Beaver Creek	TN06010102042 – 2000 ^e	>61.1	NA	NA	0	>65.0	>65.0
	Cedar Creek	TN06010102042 - 0500	23.9	NA	NA	0	31.5	31.5

Notes: NA = Not Applicable.

- a. Future WWTFs must meet instream water quality standards at the point of discharge as specified in their NPDES permit.
- b. Pathogen loading due to collection system failure is considered to be unpermitted point source loading from the municipal WWTF. With respect to pathogen loading from leaking collection systems, a WLA of zero is assigned. It is recognized, however, that a WLA of 0 CFU/day may not be practical. For these unpermitted sources, the WLA is interpreted to mean a reduction in pathogen loading to the maximum extent practicable, consistent with the requirement that these sources not contribute to a violation of the water quality standard for E. coli.
- Applies to any MS4 discharge loading in the subwatershed or drainage area.
- d. The load allocations (LAs) listed apply to precipitation induced nonpoint sources only. The objective for all "other direct sources" (leaking septic systems, illicit discharges, and animals access to streams) is a LA of zero. It is recognized, however, that for leaking septic systems a LA of 0 CFU/day may not be practical. For these unpermitted sources, the LA is interpreted to mean a reduction in E. coli loading to the maximum extent practicable, consistent with the requirement that these sources not contribute to a violation of the water quality standard for E. coli.
- e. Portions of these waterbodies lie in another state. A TMDL for Fecal Coliform has been developed by the State of Virginia for those portions of the waterbodies lying within their jurisdiction. The required load reduction is for the Tennessee portion of the waterbodies.

PROPOSED E. COLI TOTAL MAXIMUM DAILY LOAD (TMDL) SOUTH FORK HOLSTON RIVER WATERSHED (HUC 06010102)

1.0 INTRODUCTION

Section 303(d) of the Clean Water Act requires each state to list those waters within its boundaries for which technology based effluent limitations are not stringent enough to protect any water quality standard applicable to such waters. Listed waters are prioritized with respect to designated use classifications and the severity of pollution. In accordance with this prioritization, states are required to develop Total Maximum Daily Loads (TMDLs) for those waterbodies that are not attaining water quality standards. State water quality standards consist of designated uses for individual waterbodies, appropriate numeric and narrative water quality criteria protective of the designated uses, and an antidegradation statement. The TMDL process establishes the maximum allowable loadings of pollutants for a waterbody that will allow the waterbody to maintain water quality standards. The TMDL may then be used to develop controls for reducing pollution from both point and nonpoint sources in order to restore and maintain the quality of water resources (USEPA, 1991).

2.0 SCOPE OF DOCUMENT

This document presents details of TMDL development for waterbodies in the South Fork Holston River Watershed, identified on the Final 2004 303(d) list as not supporting designated uses due to E. coli. Portions of the South Fork Holston River Watershed lie in both Tennessee and Virginia. This document addresses only impaired waterbodies in Tennessee. TMDL analyses are performed primarily on a 12-digit hydrologic unit area (HUC-12) basis. In some cases, where appropriate, TMDLs are developed for an impaired waterbody drainage area only.

A TMDL could not be developed for the Tennessee portion of Little Creek due to insufficient monitoring data. Additional monitoring is recommended to allow for either development of a TMDL or delisting. A TMDL could not be developed for Booher Creek (06010102237_0100). Monitoring data was available for another Booher Creek (part of 06010102012_0820). This monitoring data appeared to have been used in the assessment of Booher Creek (06010102237_0100). Additional monitoring is recommended to allow for either development of a TMDL or delisting for Booher Creek (06010102237_0100).

For Beaver Creek, the TMDL analysis was revised due to the availability of new data. This revised TMDL supersedes the Fecal Coliform TMDL approved by EPA in 2004.

3.0 WATERSHED DESCRIPTION

The South Fork Holston River Watershed (HUC 06010102) is located in Eastern Tennessee (Figure 1), primarily in Sullivan and Johnson Counties. The South Fork Holston River Watershed lies within two Level III ecoregion (Blue Ridge Mountains, Ridge and Valley) and contains eight Level IV ecoregions as shown in Figure 2 (USEPA, 1997):

- The Interior Plateau (66c) is characterized by high, hilly plateau dotted with isolated monadnocks. The highest elevations of the region range from 2600-4500 feet. The Interior Plateau is underlain by Precambrian metamorphic rock, including quartzite, greywacke, and a conglomerate of the Lynchburg formation. Gneiss and schist are also found as outcrops. The region was once dominated by Appalachian Oak Forest and Oak-History-Pine Forest. Forested areas are broken by pasture and livestock farms.
- Southern Igneous Ridges and Mountains (66d) occur in Tennessee's northeastern Blue Ridge near the North Carolina border, primarily on the Precambrian-age igneaous and high-grade metamorphic rocks. The typical crystalline rock types include granite, gneiss, schist, and metavolcanics, covered by well-drained, acidic brown loamy soils. Elevations of this rough, dissected region range from 2000-6200 feet, with Roan Mountain reaching 6286 feet. Although there are a few small areas of pasture and apple orchards, the region is mostly forested; Appalachian oak and northern hardwood forests predominate.
- The Southern Sedimentary Ridges (66e) in Tennessee include some of the westernmost foothill areas of the Blue Ridges Mountains ecoregion, such as the Bean, Starr, Chilhowee, English, Stone, Bald, and Iron Mountain areas. Slopes are steep, and elevations are generally 1000-4500 feet. The rocks are primarily Cambrian-age sedimentary (shale, sandstone, siltstone, quartzite, conglomerate), although some lower stream reachs occur on limestone. Soils are predominantly friable loams and fine sandy loams with variable amounts of sandstone rock fragments, and support mostly mixed oak and oak-pine forests.
- Limestone Valleys and Coves (66f) are small but distinct lowland areas of the Blue Ridge, with elevations mostly between 1500 and 2500 feet. About 450 million years ago, older Blue Ridge rocks to the east were forced up and over younger rocks to the west. In places, the Precambrian rocks have eroded through to Cambrian or Ordovician-age limestones, as seen especially in isolated, deep cove areas that are surrounded by steep mountains. The main areas of limestone include the Mountain City lowland area and Shady Valley in the north; and Wear Cove, Tuckaleechee Cove, and Cades Cove of the Great Smoky Mountains in the south. Hay and pasture, with some tobacco patches on small farms, are typical land uses.
- The Southern Limestone/Dolomite Valleys and Low Rolling Hills (67f) form a
 heterogeneous region composed predominantly of limestone and cherty dolomite.
 Landforms are mostly low rolling ridges and valleys, and the solids vary in their
 productivity. Landcover includes intensive agriculture, urban and industrial, or areas of
 thick forest. White oak forests, bottomland oak forests, and sycamore-ash-elm riparian
 forests are the common forest types, and grassland barrens intermixed with cedar-pine
 glades also occur here.
- The Southern Shale Valleys (67g) consist of lowlands, rolling valleys, and slopes and hilly areas that are dominated by shale materials. The northern areas are associated with Ordovician-age calcareous shale, and the well-drained soils are often slightly acid to neutral. In the south, the shale valleys are associated with Cambrian-age shales that contain some narrow bands of limestone, but the soils tend to be strongly acid. Small

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farms and rural residences subdivide the land. The steeper slopes are used for pasture or have reverted to brush and forested land, while small fields of hay, corn, tobacco, and garden crops are grown on the foot slopes and bottomland.

- The Southern Sandstone Ridges (67h) ecoregion encompasses the major sandstone ridges, but these ridges also have areas of shale and siltstone. The steep, forested chemistry of streams flowing down the ridges can vary greatly depending on the geologic material. The higher elevation ridges are in the north, including Wallen Ridge, Powell Mountain, Clinch Mountain, and Bays Mountain. White Oak Mountain in the south has some sandstone on the west side, but abundant shale and limestone as well. Grindstone Mountain, capped by the Gizzard Group sandstone, is the only remnant of Pennsylvanian-age strata in the Ridge and Valley of Tennessee.
- The Southern Dissected Ridges and Knobs (67i) contain more crenulated, broken, or hummocky ridges, compared to smoother, more sharply pointed sandstone ridges. Although shale is common, there is a mixture and interbedding of geologic materials. The ridges on the east side of Tennessee's Ridge and Valley tend to be associated with the Ordovician-age Sevier shale, Athens shale, and Holston and Lenoir limestones. These can include calcareous shale, limestone, siltstone, sandstone, and conglomerate. In the central and western part of the ecoregion, the shale ridges are associated with the Cambrian-age Rome Formation: shale and siltstone with beds of sandstone. Chestnut oak forests and pine forests are typical for the higher elevations of the ridges, with areas of white oak, mixed mesophytic forest, and tulip poplar on the lower slopes, knobs, and draws.

The South Fork Holston River Watershed, located in Carter, Greene, Hawkins, Johnson, Sullivan, and Washington Counties, Tennessee, has a drainage area of approximately 550 square miles (mi²) in Tennessee. The entire watershed, including Tennessee and Virginia, drains approximately 1,170 square miles. Watershed land use distribution is based on the Multi-Resolution Land Characteristic (MRLC) databases derived from Landsat Thematic Mapper digital images from the period 1990-1993. Although changes in the land use of the South Fork Holston River Watershed have occurred since 1993 as a result of development, this is the most current land use data available. Land use for the South Fork Holston River Watershed is summarized in Table 1 and shown in Figure 3. Predominant land use in the Tennessee portion of the South Fork Holston River Watershed is forest (68%) followed by pasture (17%). Urban areas represent approximately 8% of the total drainage area of the watershed. Details of land use distribution of impaired subwatersheds in the South Fork Holston River Watershed are presented in Appendix A.

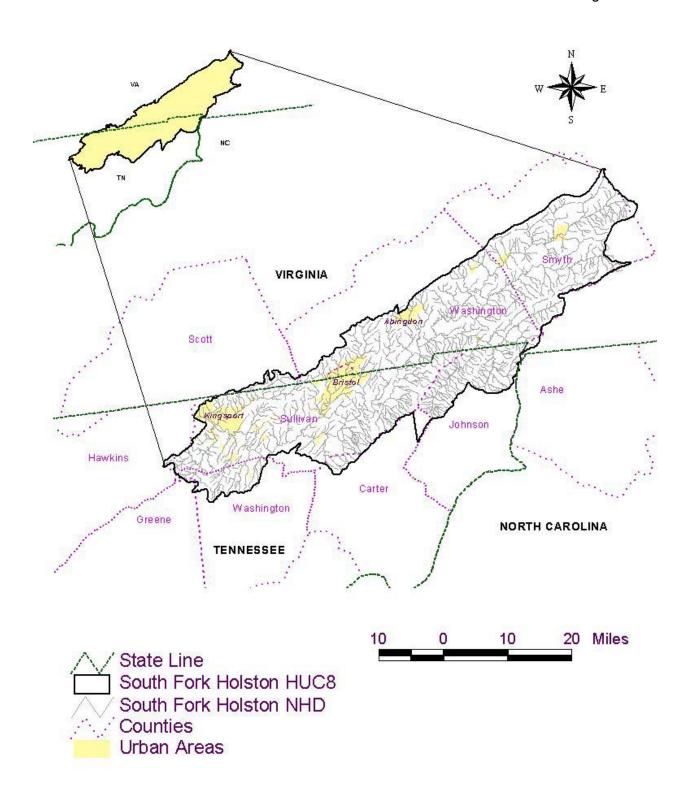


Figure 1. Location of the South Fork Holston River Watershed.

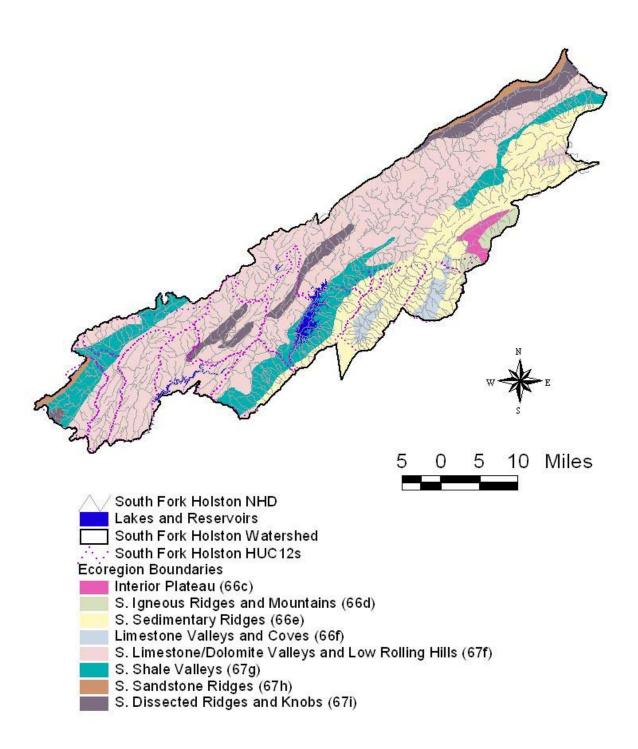


Figure 2. Level IV Ecoregions in the South Fork Holston River Watershed.

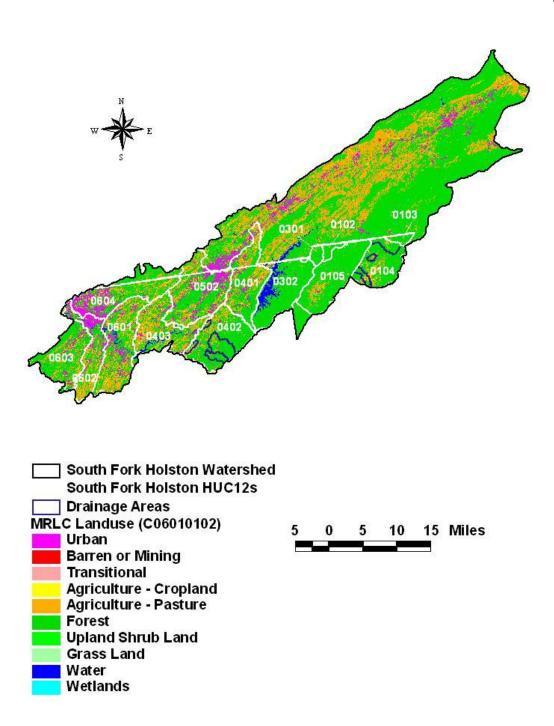


Figure 3. Land Use Characteristics of the South Fork Holston River Watershed.

Table 1. MRLC Land Use Distribution - South Fork Holston River Watershed

Land Use	Area – Ent	ire HUC8	Area – Tennessee only		
Edild 600	[acres]	%]	[acres]	[%]	
Bare Rock/Sand/Clay	1,023	0.1	1,011	0.3	
Deciduous Forest	328,286	43.9	132,541	37.9	
Emergent Herbaceous Wetlands	356	0.0	211	0.1	
Evergreen Forest	92,193	12.3	49,430	14.1	
High Intensity Commercial/Industrial/ Transportation	12,717	1.7	7,531	2.2	
High Intensity Residential	3,555	0.5	2,523	0.7	
Low Intensity Residential	31,252	4.2	20,460	5.9	
Mixed Forest	77,418	10.4	54,305	15.5	
Open Water	9,388	1.3	7,744	2.2	
Other Grasses (Urban/recreational)	6,579	0.9	5,980	1.7	
Pasture/Hay	168,584	22.5	58,061	16.6	
Quarries/Strip Mines/ Gravel Pits	188	0.0	23	0.0	
Row Crops	14,393	1.9	8,625	2.5	
Transitional	405	0.1	338	0.1	
Woody Wetlands	1,277	0.2	901	0.3	
Total	747,614	100.0	349,685	100.0	

4.0 PROBLEM DEFINITION

The State of Tennessee's final 2004 303(d) list (TDEC, 2005) was approved by the U.S. Environmental Protection Agency (EPA), Region IV in August of 2005. This list identified portions of seventeen waterbodies in the South Fork Holston River Watershed as not supporting designated use classifications due, in part, to E. coli (see Table 2 & Figure 4). The designated use classifications for these waterbodies include fish and aquatic life, irrigation, livestock watering & wildlife, and recreation.

When used in the context of waterbody assessments, the term pathogens is defined as disease-causing organisms such as bacteria or viruses that can pose an immediate and serious health threat if ingested or introduced into the body. The primary sources for pathogens are untreated or inadequately treated human or animal fecal matter. The E. coli and fecal coliform groups are indicators of the presence of pathogens in a stream.

5.0 WATER QUALITY CRITERIA & TMDL TARGET

As previously stated, the designated use classifications for the South Fork Holston River waterbodies include fish & aquatic life, recreation, irrigation, and livestock watering & wildlife. Of the use classifications with numeric criteria for pathogens, the recreation use classification is the most stringent and will be used to establish target levels for TMDL development. The coliform water quality criteria, for protection of the recreation use classification, is established by *State of Tennessee Water Quality Standards, Chapter 1200-4-3, General Water Quality Criteria, January 2004* (TDEC, 2004a). Section 1200-4-3-.03 (4) (f) states:

The concentration of the E. coli group shall not exceed 126 colony forming units per 100 mL, as a geometric mean based on a minimum of 5 samples collected from a given sampling site over a period of not more than 30 consecutive days with individual samples being collected at intervals of not less than 12 hours. For the purposes of determining the geometric mean, individual samples having an E. coli concentration of less than 1 per 100 mL shall be considered as having a concentration of 1 per 100 mL.

Additionally, the concentration of the E. coli group in any individual sample taken from a lake, reservoir, State Scenic River, or Tier II or III stream (1200-4-3-.06) shall not exceed 487 colony forming units per 100 mL. The concentration of the E. coli group in any individual sample taken from any other waterbody shall not exceed 941 colony forming units per 100 mL.

Portions of Big Arm Branch, Laurel Creek, Little Creek, Morrell Creek, and Waters Branch within the Cherokee National Forest have been classified as Tier II streams. As of February 2, 2006, none of the other E. coli impaired waterbodies in the Watauga Watershed have been classified as either Tier II or Tier III streams.

The geometric mean standard for the E. coli group of 126 colony forming units per 100 ml (CFU/100 ml) and the sample maximum of 487 CFU/100 ml have been selected as the appropriate numerical targets for TMDL development for impaired waterbodies classified as Tier II streams. The geometric mean standard for the E. coli group of 126 colony forming units per 100 ml (CFU/100 ml) and the sample maximum of 941 CFU/100 ml have been selected as the appropriate numerical targets for TMDL development for the other impaired waterbodies.

Table 2 Final 2004 303(d) List for E. coli Impaired Waterbodies – South Fork Holston River Watershed

Waterbody ID	Impacted Waterbody	Miles/Acres Impaired	Cause (Pollutant)	Pollutant Source
TN06010102006T – 0200	WAGNER CREEK	5.5	Habitat loss due to alteration in stream- side or littoral vegetative cover Loss of biological integrity due to siltation Escherichia coli	Grazing in Riparian or Shoreline Zones
TN06010102006T – 0300	CANDY CREEK	3.2	Habitat loss due to alteration in stream- side or littoral vegetative cover Loss of biological integrity due to siltation Escherichia coli	Grazing in Riparian or Shoreline Zones
TN06010102012 – 0100	UNNAMED TRIB TO SOUTH FORK HOLSTON (at Silver Grove Rd.)	2.0	Habitat loss due to alteration in stream- side or littoral vegetative cover Loss of biological integrity due to siltation Escherichia coli	Grazing in Riparian or Shoreline Zones
TN06010102012 – 0300	UNNAMED TRIB TO SOUTH FORK HOLSTON	3.89	Habitat loss due to alteration in stream- side or littoral vegetative cover Loss of biological integrity due to siltation Escherichia coli	Grazing in Riparian or Shoreline Zones
TN06010102012 – 0400	MORRELL CREEK	4.89	Escherichia coli	Grazing in Riparian or Shoreline Zones
TN06010102012 – 0700	DRY CREEK	1.0	Habitat loss due to alteration in stream- side or littoral vegetative cover Loss of biological integrity due to siltation Escherichia coli	Animal Feeding Operations (NPS)
TN06010102012 – 0810	BIG ARM BRANCH	5.77	Habitat loss due to alteration in stream- side or littoral vegetative cover Loss of biological integrity due to siltation Escherichia coli	On-site Treatment Systems (Septic Systems and Similar)
TN06010102012 – 0820	WOODS BRANCH	5.0	Polycyclic Aromatic Hydrocarbons (PAHs) Escherichia coli	Grazing in Riparian or Shoreline Zones
TN06010102012 – 0900	WEAVER BRANCH	5.9	Escherichia coli	Grazing in Riparian or Shoreline Zones

Table 2 (cont'd). Final 2004 303(d) List for E. coli Impaired Waterbodies – South Fork Holston River Watershed

Waterbody ID	Impacted Waterbody	Miles/Acres Impaired	Cause (Pollutant)	Pollutant Source
TN060101020250 – 0900	WATERS BRANCH	1.82	Escherichia coli	Grazing in Riparian or Shoreline Zones
TN060101020250 – 2000	LAUREL CREEK	3.8	Escherichia coli	Grazing in Riparian or Shoreline Zones
TN06010102042 – 0200	BACK CREEK (from Beaver Crk to headwaters; not incl. Unnamed trib)	14.1	Nitrates Loss of biological integrity due to siltation Physical Substrate Habitat Alterations Escherichia coli	Unrestricted Cattle Access Grazing in Riparian or Shoreline Zones
TN06010102042 – 0400	LITTLE CREEK	0.3	Escherichia coli	Discharges from MS4 area Sources Outside of State
TN06010102042 – 0500	CEDAR CREEK	11.8	Nitrates Loss of biological integrity due to saltation Other anthropogenic Habitat Alterations Escherichia coli	Discharges from MS4 area
TN06010102042 – 1000	BEAVER CREEK (from S. Fork Holston to Cedar Creek)	11.1	Escherichia coli	Discharges from MS4 area Grazing in Riparian or Shoreline Zones
TN06010102042 – 2000	BEAVER CREEK (from Cedar Creek to Virginia stateline)	10.5	Habitat loss due to alteration in stream- side or littoral vegetative cover Nitrates Loss of biological integrity due to siltation Escherichia coli	Discharges from MS4 area Grazing in Riparian or Shoreline Zones Sources Outside of State
TN060101020540 - 0800	PAINT SPRING BRANCH	1.0	Habitat loss due to alteration in stream- side or littoral vegetative cover Loss of biological integrity due to siltation Escherichia coli	Grazing in Riparian or Shoreline Zones
TN06010102237 - 0100	BOOHER CREEK	7.2	Escherichia coli	Grazing in Riparian or Shoreline Zones

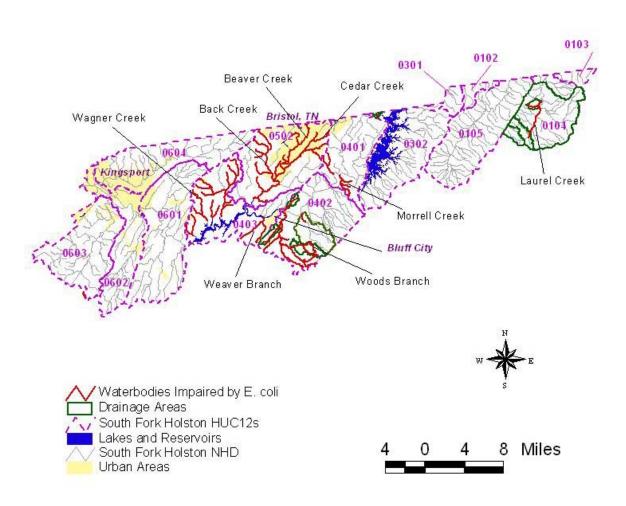


Figure 4. Waterbodies Impaired by E. Coli (as Documented on the Final 2004 303(d) List). (Major impaired waterbodies have been labeled as a point of reference.)

6.0 WATER QUALITY ASSESSMENT AND DEVIATION FROM TARGET

There are numerous water quality monitoring stations that provide data for waterbodies identified as impaired for E. coli in the South Fork Holston River Watershed. Monitoring stations located on Tier II waterbodies have been italicized:

- HUC-12 06010102 0104:
 - LAURE007.0JO Laurel Creek, 0.1 mi south of Taylor Rd.
 - o LAURE013.8JO Laurel Creek, at Cold Springs Rd.
 - o LAURE015.0JO Laurel Creek, at Corum & Flatwood Br.
 - WATER000.1JO Waters Branch, at Waters Rd.
- HUC-12 06010102_0302:
 - PSPRI001.4SU Paint Spring Branch, at 233 Painter Rd.
- HUC-12 06010102 0401:
 - MORRE000.1SU Morrell Creek, beside Central Church
 - SFHOL3T0.7SU Trib to South Fork Holston, at Bullock Hollow Rd., 0.2 mi south of Sugar Hollow Rd.
- HUC-12 06010102_0402:
 - o BARM000.1CT Big Arm Branch, at Bunker Hill Rd.
 - BOOHE000.3SU Booher Creek, d/s of Plank farm & Plank Rd.
 - DRY000.2SU Dry Creek, d/s of cattle farm
 - DRY001.3SU Dry Creek, off Holston Mtn Rd., u/s of cattle farm
 - SFHOL2T0.6SU Trib to South Fork Holston, Trib to South Fork Holston, at intersection of Wilver Gr & Riverside Rd.
 - WOODS000.5SU Woods Branch, d/s of Lyons Rd, behind Lyons log cabin
- HUC-12 06010102 0403:
 - CANDY001.7SU Candy Creek, off Hawley Rd.
 - WAGNE001.9SU Wagner Creek, u/s of Holston Dr. bridge
 - WEAVE000.7SU Weaver Branch, d/s of eads Rd. bridge
- HUC-12 06010102 0502:
 - BACK000.5SU Back Creek, 100 yds u/s of Exide Rd.
 - BACK003.1SU Back Creek, at driveway off Carden Highway Rd., 0.7 mi from SR75
 - BEAVE011.0SU Beaver Creek, at Rooster Front park, d/s of Steele Creek
 - BEAVE015.3SU Beaver Creek, at bridge on Anderson St., at TN/VA state line
 - CEDAR000.3SU Cedar Creek, 200 yds u/s of Grovedale Rd.

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The location of these monitoring stations is shown in Figure 5. Water quality monitoring results for these stations are tabulated in Appendix C. Examination of the data shows exceedances of the 487 CFU/100 mL (Tier II) and 941 CFU/100 mL (non-Tier II) maximum E. coli standard at many monitoring stations. Water quality monitoring results for those stations with 10% or more of samples exceeding water quality maximum criteria are summarized in Table 3.

There were not enough data to calculate the geometric mean at each monitoring station. Whenever a minimum of 5 samples was collected at a given monitoring station over a period of not more than 30 consecutive days, the geometric mean was calculated.

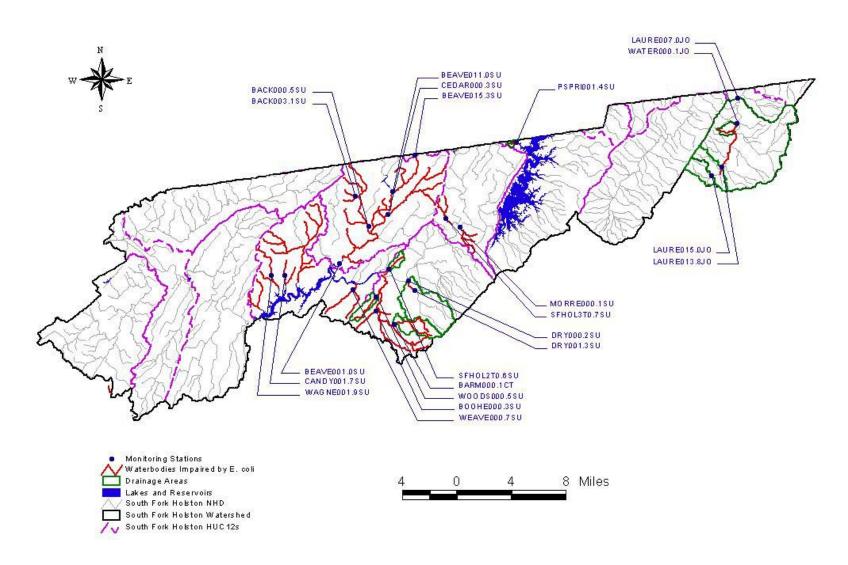


Figure 5. Water Quality Monitoring Stations in the South Fork Holston River Watershed

Table 3 Summary of TDEC Water Quality Monitoring Data

Monitoring		E. Coli (Max WQ Target = 941 Counts/100 mL)**							
Station	Date Range	D 1 D1	Min.	Avg.	Max.	No. Exceed.			
		Data Pts.	[CFU/100 ml]	[CFU/100 ml]	[CFU/100 ml]	WQ Max. Target			
BACK000.5SU	1999 – 2003	13	29	>963	>2,419	4			
BARM000.1CT	2002 – 2003	9	40	>813	>2,420	4			
BEAVE001.0SU	1998 – 2004	33	5	>742	>2,419	9			
BEAVE011.0SU	2002 – 2003	12	326	1,279	2,419	8			
BEAVE015.3SU	1998 – 2004	33	144	>1,689	2,600	26			
BOOHE000.3SU	2002 – 2003	9	99	>895	>2,420	4			
CANDY001.7SU	2002 – 2003	9	64	>1,125	>2,420	4			
CEDAR000.3SU	1999 – 2003	13	31	708	1,414	2			
DRY000.2SU	2002 – 2003	9	>2,420	>2.420	>2,420	9			
DRY001.3SU	2003	5	52	>561	>2,420	1			
LAURE013.8JO	2002 – 2003	11	21	588	1,733	5			
LAURE015.0JO	2002 – 2003	10	1	>1,672	>2,420	8			
MORRE000.1SU	2002 – 2003	10	86	>1,056	>2,420	7			
PSPRI001.4SU	2002 – 2003	10	167	>1,376	>2,420	5			
SFHOL2T0.6SU	2002 – 2003	8	179	>883	>2,420	3			
SFHOL3T0.7SU	2002 – 2003	10	65	>1,661	>2,420	7			
WAGNE001.9SU	1999 – 2000	9	219	>1,352	>2,420	5			
WATER000.1JO	2002 – 2003	10	66	>1,210	>2,420	6			
WEAVE000.7SU	2002 – 2003	9	167	>854	>2,420	2			
WOODS000.5SU	2002 – 2003	9	47	909	1,986	4			

^{**} Maximum water quality target is 487 CFU/100 mL for Tier II waterbodies and 941 CFU/100 mL for other waterbodies. Tier II waterbodies are italicized.

7.0 SOURCE ASSESSMENT

An important part of TMDL analysis is the identification of individual sources, or source categories of pollutants in the watershed that affect pathogen loading and the amount of loading contributed by each of these sources.

Under the Clean Water Act, sources are classified as either point or nonpoint sources. Under 40 CFR §122.2, a point source is defined as a discernable, confined, and discrete conveyance from which pollutants are or may be discharged to surface waters. The National Pollutant Discharge Elimination System (NPDES) program regulates point source discharges. Point sources can be described by three broad categories: 1) NPDES regulated municipal and industrial wastewater treatment facilities (WWTFs); 2) NPDES regulated industrial and municipal storm water discharges; and 3) NPDES regulated Concentrated Animal Feeding Operations (CAFOs). A TMDL must provide Waste Load Allocations (WLAs) for all NPDES regulated point sources. Nonpoint sources are diffuse sources that cannot be identified as entering a waterbody through a discrete conveyance at a single location. For the purposes of this TMDL, all sources of pollutant loading not regulated by NPDES permits are considered nonpoint sources. The TMDL must provide a Load Allocation (LA) for these sources.

7.1 Point Sources

7.1.1 NPDES Regulated Municipal and Industrial Wastewater Treatment Facilities

Both treated and untreated sanitary wastewater contain coliform bacteria. There are 13 WWTFs in the South Fork Holston River Watershed that have NPDES permits authorizing the discharge of treated sanitary wastewater. Three of these facilities are located in impaired subwatersheds or drainage areas (see Table 4 & Figure 6). One additional facility is located in an impaired subwatershed or drainage area, but discharges to an unimpaired waterbody. The permit limits for discharges from these WWTFs are in accordance with the coliform criteria specified in Tennessee Water Quality Standards for the protection of the recreation use classification.

Non-permitted point sources of (potential) E. coli contamination of surface waters associated with STP collection systems include leaking collection systems and sanitary sewer overflows (SSOs).

Note: As stated in Section 5.0, the current coliform criteria are expressed in terms of E. coli concentration, whereas previous criteria were expressed in terms of fecal coliform and E. coli concentration. Due to differences in permit issuance dates, some permits still have fecal coliform limits instead of E. coli. As permits are reissued, limits for fecal coliform will be replaced by E. coli limits.

A summary of effluent monitoring data, submitted on Discharge Monitoring Reports (DMRs) for the period from January 1998 to November 2005, for facilities that are located in HUC-12 subwatersheds or drainage areas containing waterbodies impaired for pathogens is presented in Table 5. Fecal coliform data are presented for informational purposes only. DMRs are not required for "package plants" such as those in operation at the Homeowners Association and Weaver and Akard Elementary Schools. Monthly Operation Reports (MORs) are submitted to the local Environmental Field Office.

Table 4 NPDES Permitted WWTFs in Impaired Subwatersheds or Drainage Areas

		•			
NPDES Permit No.	Facility	Design Flow	Receiving Stream		
		[MGD]			
TN0025186	Weaver Elementary School	0.003 *	Unnamed tributary to Whitetop Creek at RM 3.8		
TN0025178	Akard Elementary School	0.006	Unnamed tributary to Back Creek at RM 4.0		
TN0056669	Misty Waters Homeowners Association	0.035	Unnamed tributary to Wagner Creek at RM 0.4		
TN0023531	Bristol STP #2	15	S. Fork Holston River at RM 29.6 (Boone reservoir)		

Table 5 Summary of DMRs for NPDES Permitted WWTFs in Impaired Subwatersheds or Drainage Areas

	E. Coli			Fecal Coliform				Fecal Coliform								
	(Permit Limit = 126 CFU/100 mL Avg.)			(Permit Limit = 200 CFU/100 mL Avg.)				(Permit Limit = 1000 CFU/100 mL Max.)				No.				
NPDES	Data	Min.	Avg.	Max.	No.	Data	Min.	Avg.	Max.	No.	Data	Min.	Avg.	Max.	No.	Bypass/ Overflow
Permit No.	Pts.	(CF	U/100	mL)	Exceed.	Pts.	(CF	U/100	mL)	Exceed.	Pts.	(CF	U/100	mL)	Exceed.	Events
TN0023531	18 ^a	1	4	8	0	95 ^b	2	28	219	1	95 ^b	7	467	1780	23	109

a. Period of record for E. coli data is June 2004 to November 2005

b. Period of record for Fecal coliform data is January 1998 to November 2005

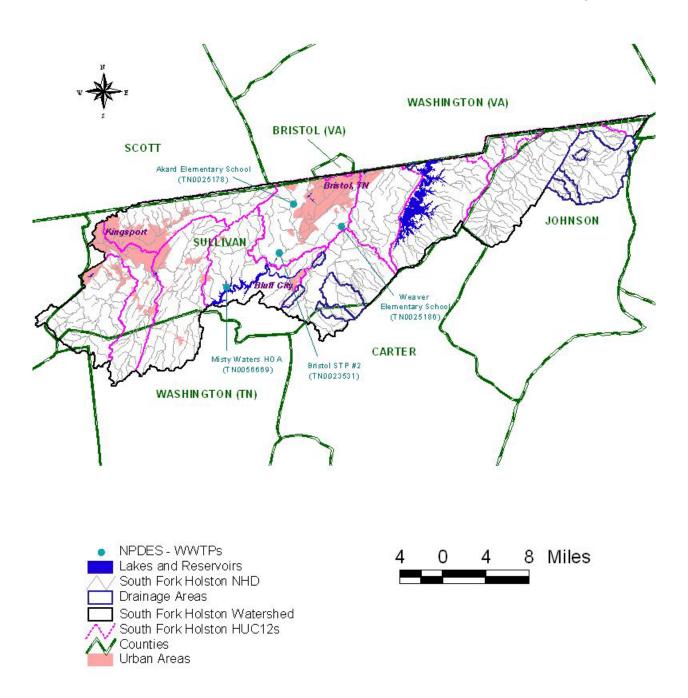


Figure 6. NPDES Regulated Point Sources in and near Impaired Subwatersheds and Drainage Areas of the South Fork Holston River Watershed.

The Bristol STP is located in the Tennessee portion of the South Fork Holston River watershed and serves both Bristol, Virginia, and Bristol, Tennessee, municipalities. However, the sanitary sewage collection system, with documented long-term wet-weather overflow problems, has historically been a significant source of coliform loading to the Beaver Creek subwatershed during these overflow events.

7.1.2 NPDES Regulated Municipal Separate Storm Sewer Systems (MS4s)

Municipal Separate Storm Sewer Systems (MS4s) are considered to be point sources of E. coli. Discharges from MS4s occur in response to storm events through road drainage systems, curb and gutter systems, ditches, and storm drains. Phase I of the EPA storm water program requires large and medium MS4s to obtain NPDES storm water permits. Large and medium MS4s are those located in incorporated places or counties serving populations greater than 100,000 people. At present, there are no MS4s of this size in the South Fork Holston River Watershed.

As of March 2003, regulated small MS4s in Tennessee must also obtain NPDES permits in accordance with the Phase II storm water program. A small MS4 is designated as regulated if: a) it is located within the boundaries of a defined urbanized area that has a residential population of at least 50,000 people and an overall population density of 1,000 people per square mile; b) it is located outside of an urbanized area but within a jurisdiction with a population of at least 10,000 people, a population density of 1,000 people per square mile, and has the potential to cause an adverse impact on water quality; or c) it is located outside of an urbanized area but contributes substantially to the pollutant loadings of a physically interconnected MS4 regulated by the NPDES storm water program. Most regulated small MS4s in Tennessee obtain coverage under the NPDES General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (TDEC, 2003). Bristol, TN, Kingsport, and Sullivan County are covered under Phase II of the NPDES Storm Water Program. Bluff City and Carter County have applications pending for coverage under Phase II of the NPDES Storm Water Program.

The Tennessee Department of Transportation (TDOT) has been issued an individual MS4 permit that authorizes discharges of storm water runoff from State roads and interstate highway right-of-ways that TDOT owns or maintains, discharges of storm water runoff from TDOT owned or operated facilities, and certain specified non-storm water discharges. This permit covers all eligible TDOT discharges statewide, including those located outside of urbanized areas.

Information regarding storm water permitting in Tennessee may be obtained from the Tennessee Department of Environment and Conservation (TDEC) website at:

http://www.state.tn.us/environment/wpc/stormh2o/.

7.1.3 NPDES Concentrated Animal Feeding Operations (CAFOs)

Animal feeding operations (AFOs) are agricultural enterprises where animals are kept and raised in confined situations. AFOs congregate animals, feed, manure and urine, dead animals, and production operations on a small land area. Feed is brought to the animals rather than the animals grazing or otherwise seeking feed in pastures, fields, or on rangeland (USEPA, 2002a). Concentrated Animal Feeding Operations (CAFOs) are AFOs that meet certain criteria with respect

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to animal type, number of animals, and type of manure management system. CAFOs are considered to be potential point sources of pathogen loading and are required to obtain an NPDES permit. Most CAFOs in Tennessee obtain coverage under TNA000000, *Class II Concentrated Animal Feeding Operation General Permit*, while larger, Class I CAFOs are required to obtain an individual NPDES permit.

As of May 11, 2005, there are no Class II CAFOs in the South Fork Holston River watershed with coverage under the general NPDES permit. There are also no Class I CAFOs with individual permits located in the watershed.

7.2 Nonpoint Sources

Nonpoint sources of coliform bacteria are diffuse sources that cannot be identified as entering a waterbody through a discrete conveyance at a single location. These sources generally, but not always, involve accumulation of coliform bacteria on land surfaces and wash off as a result of storm events. Nonpoint sources of E. coli loading are primarily associated with agricultural and urban land uses. The majority of waterbodies identified on the Final 2004 303(d) list as impaired due to E. coli are attributed to nonpoint agricultural or urban sources.

7.2.1 Wildlife

Wildlife deposit coliform bacteria, with their feces, onto land surfaces where it can be transported during storm events to nearby streams. The overall deer density for Tennessee was estimated by the Tennessee Wildlife Resources Agency (TWRA) to be 23 animals per square mile.

7.2.2 Agricultural Animals

Agricultural activities can be a significant source of coliform bacteria loading to surface waters. The activities of greatest concern are typically those associated with livestock operations:

- Agricultural livestock grazing in pastures deposit manure containing coliform bacteria onto land surfaces. This material accumulates during periods of dry weather and is available for washoff and transport to surface waters during storm events. The number of animals in pasture and the time spent grazing are important factors in determining the loading contribution.
- Processed agricultural manure from confined feeding operations is often applied to land surfaces and can provide a significant source of coliform bacteria loading. Guidance for issues relating to manure application is available through the University of Tennessee Agricultural Extension Service and the Natural Resources Conservation Service (NRCS).
- Agricultural livestock and other unconfined animals often have direct access to waterbodies and can provide a concentrated source of coliform bacteria loading directly to a stream.

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Data sources related to livestock operations include the 2002 Census of Agriculture. Another useful data source was the Integrated Pollutant Source Identification (IPSI) in the Beaver Creek watershed conducted by the Tennessee Valley Authority (TVA) (TVA, 2004). The IPSI provided information on livestock operations classified by relative size, accurate to the nearest 15 cows and 5 horses. Data from the IPSI, when available, are considered to be more accurate because they are based on actual location and size rather than an area ratio. Livestock data for counties containing E. colimpaired watersheds are summarized in Table 6.

7.2.3 Failing Septic Systems

Some coliform loading in the South Fork Holston River Watershed can be attributed to failure of septic systems and illicit discharges of raw sewage. Estimates from 1997 county census data of people in the South Fork Holston River Watershed utilizing septic systems were compiled using the WCS and are summarized in Table 7. In middle and eastern Tennessee, it is estimated that there are approximately 2.37 people per household on septic systems, some of which can be reasonably assumed to be failing. As with livestock in streams, discharges of raw sewage provide a concentrated source of coliform bacteria directly to waterbodies.

7.2.4 Urban Development

Nonpoint source loading of coliform bacteria from urban land use areas is attributable to multiple sources. These include: stormwater runoff, illicit discharges of sanitary waste, runoff from improper disposal of waste materials, leaking septic systems, and domestic animals. Impervious surfaces in urban areas allow runoff to be conveyed to streams quickly, without interaction with soils and groundwater. Urban land use area in impaired subwatersheds in the South Fork Holston River Watershed ranges from 0.6% (Laurel Creek drainage area) to 19.0% (HUC-12 0502). Land use for the South Fork Holston River impaired drainage areas is summarized in Figures 7 thru 10 and tabulated in Appendix A.

Table 6 Livestock Distribution in the South Fork Holston River Watershed

	Livestock Population (2002 Census of Agriculture)									
County	Beef	Milk	Pou	ıltry	Hogs	Sheep	Horse			
	Cow	Cow	Layers	Broilers	11093	Опсер	110130			
Carter	3,559	548	49	10	34	25	1,087			
Johnson	4,397	216	382	103	102	180	720			
Sullivan	13,632	720	1,118	154	186	381	2,738			
Washington	21,590	3,117	557	D	270	2,883	2,424			

^{*} In keeping with the provisions of Title 7 of the United States Code, no data are published in the 2002 Census of Agriculture that would disclose information about the operations of an individual farm or ranch. Any tabulated item that identifies data reported by a respondent or allows a respondent's data to be accurately estimated or derived is suppressed and coded with a 'D' (USDA, 2004).

Table 7 Population on Septic Systems in the South Fork Holston River Watershed

HUC-12 Subwatershed (06010102) or Drainage Area	Population on Septic Systems				
Waters Branch DA	40				
Laurel Creek DA	1,560				
Paint Spring Branch DA	52				
0401 (Morrell Creek)	8,184				
Unnamed Trib #2 DA	183				
Big Arm Branch DA	505				
Dry Creek DA	1,913				
Woods Branch DA	341				
0403 (Wagner & Weaver Creeks)	11,947				
0502 (Beaver Creek)	9,553				

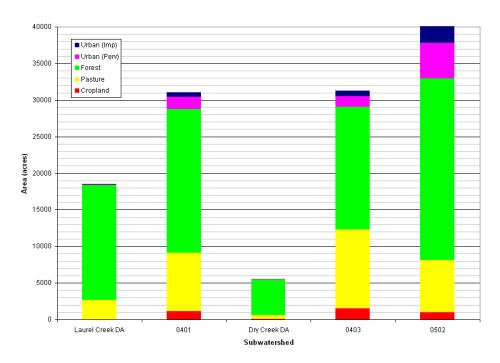


Figure 7. Land Use Area of South Fork Holston River Pathogen-Impaired Subwatersheds – Drainage Areas Greater Than 5,000 Acres.

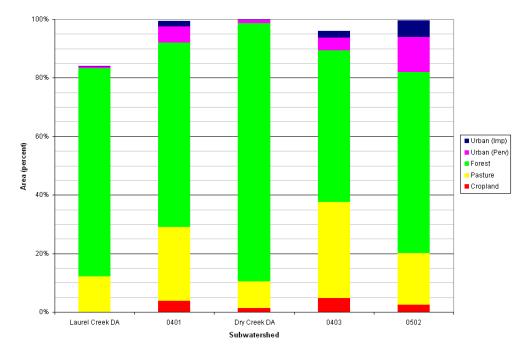


Figure 8. Land Use Percent of the South Fork Holston River Pathogen-Impaired Subwatersheds – Drainage Areas Greater Than 5,000 Acres.

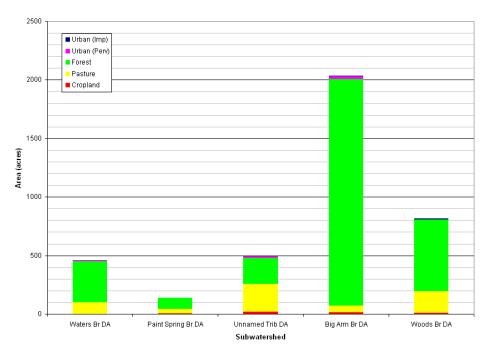


Figure 9. Land Use Area of South Fork Holston River Pathogen-Impaired Subwatersheds – Drainage Areas Less Than 5,000 Acres.

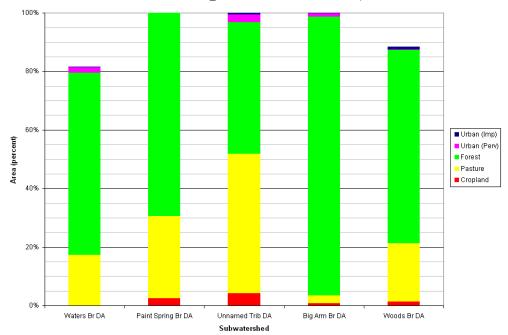


Figure 10. Land Use Percent of the South Fork Holston River Pathogen-Impaired Subwatersheds – Drainage Areas Less Than 5,000 Acres.

8.0 DEVELOPMENT OF TOTAL MAXIMUM DAILY LOADS

The Total Maximum Daily Load (TMDL) process quantifies the amount of a pollutant that can be assimilated in a waterbody, identifies the sources of the pollutant, and recommends regulatory or other actions to be taken to achieve compliance with applicable water quality standards based on the relationship between pollution sources and in-stream water quality conditions. A TMDL can be expressed as the sum of all point source loads (Waste Load Allocations), non-point source loads (Load Allocations), and an appropriate margin of safety (MOS) that takes into account any uncertainty concerning the relationship between effluent limitations and water quality:

TMDL =
$$\Sigma$$
 WLAs + Σ LAs + MOS

The objective of a TMDL is to allocate loads among all of the known pollutant sources throughout a watershed so that appropriate control measures can be implemented and water quality standards achieved. 40 CFR §130.2 (i) states that TMDLs can be expressed in terms of mass per time, toxicity, or other appropriate measure.

This document describes TMDL, Waste Load Allocation (WLA), and Load Allocation (LA) development for waterbodies identified as impaired due to E. coli on the Final 2004 303(d) list.

8.1 Expression of TMDLs, WLAs, & LAs

In this document, TMDLs are expressed as the percent reduction in instream loading required to decrease existing E. coli concentrations to desired target levels. WLAs & LAs for precipitation-induced loading sources are also expressed as required percent reductions in E. coli loading. Allocations for loading that is independent of precipitation (WLAs for WWTFs and LAs for "other direct sources") are expressed as CFU/day.

8.2 Area Basis for TMDL Analysis

The primary area unit of analysis for TMDL development was the HUC-12 subwatershed containing one or more waterbodies assessed as impaired due to E. coli (as documented on the 2004 303(d) List). In some cases, however, TMDLs were developed for an impaired waterbody drainage area only. Determination of the appropriate area to use for analysis (see Table 8) was based on a careful consideration of a number of relevant factors, including: 1) location of impaired waterbodies in the HUC-12 subwatershed; 2) land use type and distribution; 3) water quality monitoring data; and 4) the assessment status of other waterbodies in the HUC-12 subwatershed.

8.3 TMDL Analysis Methodology

TMDLs for the South Fork Holston River Watershed were developed using load duration curves for analysis of impaired HUC-12 subwatersheds or specific waterbody drainage areas. A load duration curve (LDC) is a cumulative frequency graph that illustrates existing water quality conditions (as represented by loads calculated from monitoring data), how these conditions compare to desired

Table 8 Determination of Analysis Areas for TMDL Development

HUC-12 Subwatershed (06010102)	Impaired Waterbody	Area
0104	Waters Branch	DA
0104	Laurel Creek	DA
0302	Paint Spring Branch	DA
0401	Unnamed Trib to South Fork Holston River Morrell Creek	HUC-12
	Unnamed Trib to South Fork Holston River	DA
0402	Big Arm Branch	DA
	Dry Creek	DA
	Woods Branch	DA
0403	Candy Creek Wagner Creek Weaver Branch	HUC-12
0502	Back Creek 0502 Beaver Creek (-1000 & -2000) Cedar Creek	

Note: HUC-12 = HUC-12 Subwatershed DA = Waterbody Drainage Area

targets, and the portion of the waterbody flow regime represented by these existing loads. Load duration curves are considered to be well suited for analysis of periodic monitoring data collected by grab sample. LDCs were developed at monitoring site locations in impaired waterbodies and an overall load reduction calculated to meet E. coli targets according to the methods described in Appendix C.

8.4 Critical Conditions and Seasonal Variation

The critical condition for non-point source E. coli loading is an extended dry period followed by a rainfall runoff event. During the dry weather period, E. coli bacteria builds up on the land surface, and is washed off by rainfall. The critical condition for point source loading occurs during periods of low streamflow when dilution is minimized. Both conditions are represented in the TMDL analysis.

The ten-year period from October 1, 1994 to September 30, 2004 was used to simulate flow. This 10-year period contained a range of hydrologic conditions that included both low and high streamflows. Critical conditions are accounted for in the load duration curve analysis by using the entire period of flow and water quality data available for the impaired waterbodies. In all subwatersheds, water quality data have been collected during most flow ranges. Based on the location of the water quality exceedances on the load duration curves, no one delivery mode for E. coli appears to be dominant (see Section 9.3 and Table 9).

Seasonal variation was incorporated in the load duration curves by using the entire simulation period and all water quality data collected at the monitoring stations. The water quality data were collected during all seasons.

8.5 Margin of Safety

There are two methods for incorporating MOS in TMDL analysis: a) implicitly incorporate the MOS using conservative model assumptions; or b) explicitly specify a portion of the TMDL as the MOS and use the remainder for allocations. For development of pathogen TMDLs in the South Fork Holston River Watershed, an explicit MOS, equal to 10% of the E. coli water quality targets (ref.: Section 5.0), was utilized for determination of WLAs and LAs:

Instantaneous Maximum (Tier II): MOS = 49 CFU/100 ml
Instantaneous Maximum (non-Tier II): MOS = 94 CFU/100 ml
30-Day Geometric Mean: MOS = 13 CFU/100 ml

8.6 Determination of TMDLs

E. coli load reductions were calculated for impaired segments in the South Fork Holston River Watershed using Load Duration Curves to evaluate compliance with the maximum target concentrations according to the procedure in Appendix C. When sufficient data were available, load reductions were also developed to achieve compliance with the 30-day geometric mean target concentrations. Both instream load reductions (where applicable) for a particular waterbody were compared and the largest required load reduction was selected as the TMDL. These TMDL load reductions for impaired segments are shown in Table 9 and are applied according to the areas specified in Table 8. In cases where the geometric mean could not be developed, it is assumed that achieving the load reduction based on the maximum target concentrations should result in attainment of the geometric mean criteria.

8.7 Determination of WLAs & LAs

WLAs for MS4s and LAs for precipitation induced sources of E. coli loading were determined according to the procedures in Appendix C. These allocations represent the higher load reductions necessary to achieve instream targets <u>after application of the explicit MOS</u>. WLAs for existing WWTFs are equal to their existing NPDES permit limits. Since WWTF permit limits require that E. coli concentrations must comply with water quality criteria (TMDL targets) at the point of discharge and recognition that loading from these facilities are generally small in comparison to other loading sources, further reductions were not considered to be warranted. WLAs for CAFOs and LAs for "other direct sources" (non-precipitation induced) are equal to zero. WLAs, & LAs are summarized in Table 9.

Table 9 TMDLs, WLAs, & LAs for Impaired Subwatersheds and Drainage Areas in the South Fork Holston River Watershed

HUC-12 Subwatershed (06010102) or Drainage Area	Impaired Waterbody ID	TMDL -	WLAs					
			WWTFs ^a		Leaking	N40.4 C	LAs ^d	
			Monthly Avg.	Daily Max.	Collection Systems b	MS4s ^c		
			[% Red.]	[CFU/day]	[CFU/day]	[CFU/day]	[% Red.]	[% Red.]
0104 (DA)	Waters Branch	TN060101020250 - 0900	>79.9	NA	NA	NA	>81.9	>81.9
0104 (DA)	Laurel Creek	TN060101020250 - 2000	>79.9	NA	NA	NA	>81.9	>81.9
0302 (DA)	Painter Springs Branch	TN060101020540 - 0800	>61.1	NA	NA	NA	>65.0	>65.0
0401	Unnamed Trib to South Fork Holston River	TN06010102012 - 0300	>61.1	NA	NA	NA	>65.0	>65.0
Morrell Creek	Morrell Creek	TN06010102012 - 0400	>79.9	NA	NA	NA	>81.9	>81.9
0402 (DA)	Unnamed Trib to South Fork Holston River	TN06010102012 - 0100	>45.2	NA	NA	NA	>50.6	>50.6
0402 (DA)	Big Arm Branch	TN06010102012 - 0810	>79.9	NA	NA	NA	>81.9	>81.9
0402 (DA)	Dry Creek	TN06010102012 - 0700	>61.1	NA	NA	NA	>65.0	>65.0
0402 (DA)	Woods Branch	TN06010102012 - 0820	34.5	NA	NA	NA	41.1	41.1
0403 V	Candy Creek	TN06010102006T - 0300	>54.6	NA	NA	NA	>59.1	>59.1
	Wagner Creek	TN06010102006T - 0200	>61.1	1.669x10 ⁸	1.247x10 ⁹	NA	>65.0	>65.0
	Weaver Branch	TN06010102012 - 0900	>49.7	NA	NA	NA	>54.7	>54.7

Table 9 (cont'd) TMDLs, WLAs, & LAs for Impaired Subwatersheds and Drainage Areas in the South Fork Holston River Watershed

		Impaired Waterbody ID	TMDL	WLAs				
HUC-12 Subwatershed (06010102) or Drainage Area	WWTFs ^a			Leaking	MS4s ^c	LAs ^d		
	Monthly Avg.			Daily Max.	- Collection Systems ^b	IVIS48		
	[% Red.]		[CFU/day]	[CFU/day]	[CFU/day]	[% Red.]	[% Red.]	
	Back Creek	TN06010102042 – 0200	>44.6	2.861x10 ⁷	2.137x10 ⁸	0	>50.1	>50.1
0502	Beaver Creek	TN06010102042 - 1000	>59.7	1.431x10 ⁷	1.069x10 ⁸	0	>63.7	>63.7
0302	Beaver Creek	TN06010102042 – 2000 ^e	>61.1	NA	NA	0	>65.0	>65.0
	Cedar Creek	TN06010102042 - 0500	23.9	NA	NA	0	31.5	31.5

Notes: NA = Not Applicable.

- a. Future WWTFs must meet instream water quality standards at the point of discharge as specified in their NPDES permit.
- b. Pathogen loading due to collection system failure is considered to be unpermitted point source loading from the municipal WWTF. With respect to pathogen loading from leaking collection systems, a WLA of zero is assigned. It is recognized, however, that a WLA of 0 CFU/day may not be practical. For these unpermitted sources, the WLA is interpreted to mean a reduction in pathogen loading to the maximum extent practicable, consistent with the requirement that these sources not contribute to a violation of the water quality standard for E. coli.
- c. Applies to any MS4 discharge loading in the subwatershed or drainage area.
- d. The load allocations (LAs) listed apply to precipitation induced nonpoint sources only. The objective for all "other direct sources" (leaking septic systems, illicit discharges, and animals access to streams) is a LA of zero. It is recognized, however, that for leaking septic systems a LA of 0 CFU/day may not be practical. For these unpermitted sources, the LA is interpreted to mean a reduction in E. coli loading to the maximum extent practicable, consistent with the requirement that these sources not contribute to a violation of the water quality standard for E. coli.
- e. Portions of these waterbodies lie in another state. A TMDL for Fecal Coliform has been developed by the State of Virginia for those portions of the waterbodies lying within their jurisdiction. The required load reduction is for the Tennessee portion of the waterbodies.

9.0 IMPLEMENTATION PLAN

The TMDLs, WLAs, and LAs developed in Section 8 are intended to be the first phase of a long-term effort to restore the water quality of impaired waterbodies in the South Fork Holston River Watershed through reduction of excessive pathogen loading. Adaptive management methods, within the context of the State's rotating watershed management approach, will be used to modify TMDLs, WLAs, and LAs as required to meet water quality goals.

9.1 Point Sources

9.1.1 NPDES Regulated Municipal and Industrial Wastewater Treatment Facilities

All present and future discharges from industrial and municipal wastewater treatment facilities are required to be in compliance with the conditions of their NPDES permits at all times, including elimination of bypasses and overflows. In Tennessee, permit limits for treated sanitary wastewater require compliance with coliform water quality standards (ref: Section 5.0) prior to discharge. No additional reduction is required. WLAs for WWTFs are derived from facility design flows and permitted E. coli limits and are expressed as average loads in CFU per day.

9.1.2 NPDES Regulated Municipal Separate Storm Sewer Systems (MS4s)

For existing and future regulated discharges from municipal separate storm sewer systems, WLAs will be implemented through Phase I & II MS4 permits. These permits will require the development and implementation of a Storm Water Management Program (SWMP) that will reduce the discharge of pollutants to the "maximum extent practicable" and not cause or contribute to violations of State water quality standards. The NPDES General Permit for Discharges from Small Municipal Separate Storm Sewer Systems (TDEC, 2003) and the TDOT individual MS4 permit (TNS077585) require SWMPs to include six minimum control measures:

- Public education and outreach on storm water impacts
- Public involvement/participation
- Illicit discharge detection and elimination
- Construction site storm water runoff control
- Post-construction storm water management in new development and re-development
- Pollution prevention/good housekeeping for municipal operations

The permits also contain requirements regarding control of discharges of pollutants of concern into impaired waterbodies, implementation of provisions of approved TMDLs, and descriptions of methods to evaluate whether storm water controls are adequate to meet the requirements of approved TMDLs.

In order to evaluate SWMP effectiveness and demonstrate compliance with specified WLAs, MS4s must develop and implement appropriate monitoring programs. An effective monitoring program could include:

- Effluent monitoring at selected outfalls that are representative of particular land uses or geographical areas that contribute to pollutant loading before and after implementation of pollutant control measures.
- Analytical monitoring of pollutants of concern in receiving waterbodies, both upstream and downstream of MS4 discharges, over an extended period of time.
- Instream biological monitoring at appropriate locations to demonstrate recovery of biological communities after implementation of storm water control measures.

The Division of Water Pollution Control Johnson City Field Office should be consulted for assistance in the determination of monitoring strategies, locations, frequency, and methods within 12 months after the approval date of this TMDL. Details of the monitoring plan and monitoring data should be included in the annual report required by the MS4 permit.

9.1.3 NPDES Regulated Concentrated Animal Feeding Operations (CAFOs)

As of May 11, 2005, there are no Class I or Class II CAFOs in the South Fork Holston River watershed with coverage under the general NPDES permit. WLAs and implementation requirements are provided for any future facilities.

WLAs provided to CAFOs will be implemented through NPDES Permit No. TNA000000, General NPDES Permit for *Class II Concentrated Animal Feeding Operation* or the facility's individual permit. Among the provisions of the general permit are:

- Development and implementation of a site-specific Nutrient Management Plan (NMP) that:
 - Includes best management practices (BMPs) and procedures necessary to implement applicable limitations and standards;
 - Ensures adequate storage of manure, litter, and process wastewater including provisions to ensure proper operation and maintenance of the storage facilities.
 - o Ensures proper management of mortalities (dead animals);
 - o Ensures diversion of clean water, where appropriate, from production areas;
 - o Identifies protocols for manure, litter, wastewater and soil testing;
 - Establishes protocols for land application of manure, litter, and wastewater;
 - o Identifies required records and record maintenance procedures.

The NMP must submitted to the State for approval and a copy kept on-site.

- Requirements regarding manure, litter, and wastewater land application BMPs.
- Requirements for the design, construction, operation, and maintenance of CAFO liquid waste management systems that are constructed, modified, repaired, or placed into operation after April 13, 2006. The final design plans and specifications for these systems must meet or exceed standards in the NRCS Field Office Technical Guide and other guidelines as accepted by the Departments of Environment and Conservation, or Agriculture.

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Provisions of individual CAFO permits are similar. NPDES Permit No. TNA000000, *Class II Concentrated Animal Feeding Operation General Permit* is available on the TDEC website at http://www.state.tn.us/environment/wpc/programs/cafo/.

9.2 Nonpoint Sources

The Tennessee Department of Environment & Conservation (TDEC) has no direct regulatory authority over most nonpoint source discharges. Reductions of pathogen loading from nonpoint sources (NPS) will be achieved using a phased approach. Voluntary, incentive-based mechanisms will be used to implement NPS management measures in order to assure that measurable reductions in pollutant loadings can be achieved for the targeted impaired waters. Cooperation and active participation by the general public and various industry, business, and environmental groups is critical to successful implementation of TMDLs. There are links to a number of publications and information resources on EPA's Nonpoint Source Pollution web page (http://www.epa.gov/owow/nps/pubs.html) relating to the implementation and evaluation of nonpoint source pollution control measures.

TMDL implementation activities will be accomplished within the framework of Tennessee's Watershed Approach (ref: http://www.state.tn.us/environment/wpc/watershed/). The Watershed Approach is based on a five-year cycle and encompasses planning, monitoring, assessment, TMDLs, WLAs/LAs, and permit issuance. It relies on participation at the federal, state, local and nongovernmental levels to be successful.

The Holston River Watershed Alliance was formed in March 2000 by TVA and local stakeholders to define a vision for the watershed and to involve key partnerships in a sustainable coalition advancing that vision. Kingsport Tomorrow, a citizen-based action organization, TVA, business and government leaders from Kingsport, Sullivan and Hawkins Counties and the State of Tennessee are active participants in the effort. Recent focus has been on projects to remove impacted waters from the State's list.

BMPs have been utilized in the South Fork Holston River Watershed to reduce the amount of coliform bacteria transported to surface waters from agricultural sources. These BMPs (e.g., animal waste management systems, waste utilization, stream stabilization, fencing, heavy use area treatment, livestock exclusion, etc.) may have contributed to reductions in in-stream concentrations of coliform bacteria in the South Fork Holston River Watershed during the TMDL evaluation period. The TDA keeps a database of BMPs implemented in Tennessee. Those listed in the South Fork Holston River Watershed are shown in Figure 11. It is recommended that additional information (e.g., livestock access to streams, manure application practices, etc.) be provided and evaluated to better identify and quantify agricultural sources of coliform bacteria loading in order to minimize uncertainty in future modeling efforts.

It is further recommended that BMPs be utilized to reduce the amount of coliform bacteria transported to surface waters from agricultural sources. Demonstration sites for various types of BMPs should be established, maintained, and evaluated (performance in source reduction) over a period of at least two years prior to recommendations for utilization for subsequent implementation. E. coli sampling and monitoring are recommended during low-flow (baseflow) and storm periods at sites with and without BMPs and/or before and after implementation of BMPs.

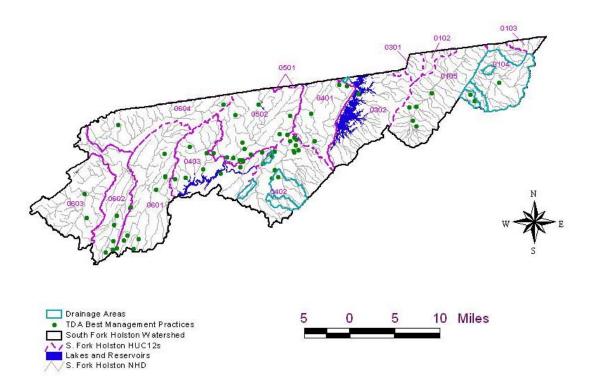


Figure 11. Tennessee Department of Agriculture Best Management Practices located in the South Fork Holston River Watershed.

9.3 Application of Load Duration Curves for Implementation Planning

The Load Duration Curve methodology (Appendix C) is a form of water quality analysis and presentation of data that aids in guiding implementation by targeting strategies to appropriate flow conditions. One of the strengths of this method is that it can be used to interpret possible delivery mechanisms of pathogens by differentiating between point and nonpoint problems. The E. coli load duration analysis was utilized for implementation planning. The E. coli load duration curve for each pathogen-impaired subwatershed (Figures C-2 through C-10) was analyzed to determine the frequency with which water quality monitoring data exceed the E. coli target maximum concentration of 941 CFU/100 mL under five flow conditions (low, dry, mid-range, moist, and high). The E. coli load duration curve for Beaver Creek at Mile 15.3 is presented in Figure 12 as an example.

Beaver Creek Load Duration Curve (1998 - 2004 Monitoring Data) Site: BEAVE015.35U

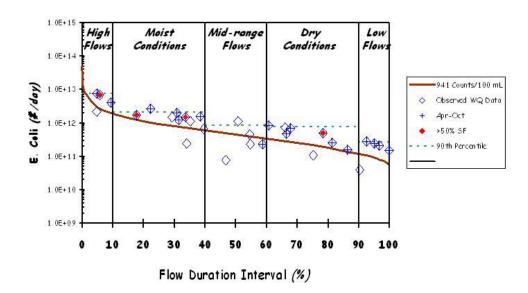


Figure 12. Sample E. Coli Load Duration Curve (Beaver Creek at Mile 15.3)

Table 10 presents an example of Load Duration analysis statistics for E. coli. Table 11 presents targeted implementation strategies for each source category covering the entire range of flow (Stiles, 2003). Each implementation strategy addresses a range of flow conditions and targets point sources, nonpoint sources, or a combination of each. Results indicate the implementation strategy for all subwatersheds will require BMPs targeting a variety of sources. The implementation strategies listed in Table 11 are a subset of the categories of BMPs and implementation strategies available for application to the pathogen-impaired South Fork Holston River Watersheds for reduction of pathogen loading and mitigation of water quality impairment.

See Appendix C for a detailed discussion of the Load Duration Curve Methodology applied to the South Fork Holston River Watershed.

Table 10 Sample Load Duration Curve Summary (Beaver Creek at Mile 15.3)

Flow Condition		High	Moist	Mid-range	Dry	Low
% Time Flow Exceeded		0-10	10-40	40-60	60-90	90- 100
Beaver Creek at Mile 15.3	% Samples > 941 CFU/100 mL	75.0	90.0	40.0	87.5	80.0
	Reduction	>61.1	>61.1	>49.7	>61.1	>61.1

Table 11 Example Implementation Strategies

Flow Condition	High	Moist	Mid-range	Dry	Low
% Time Flow Exceeded	0-10	10-40	40-60	60-90	90- 100
Municipal NPDES		L	M	Н	Н
Stormwater Management		Н	Н	Н	
SSO Mitigation	Н	Н	M	L	
Collection System Repair		L	M	Н	Н
Septic System Repair		L	M	Н	М
Livestock Exclusion ¹			M	Н	Н
Pasture Management/Land Application of Manure ¹	Н	Н	М	L	
Riparian Buffers ¹		Н	Н	Н	

Potential for source area contribution under given hydrologic condition (H: High; M: Medium; L: Low)

9.4 Additional Monitoring

Documenting progress in reducing the quantity of pathogens entering the South Fork Holston River Watershed is an essential element of the TMDL Implementation Plan. Additional monitoring and assessment activities are recommended to determine whether implementation of TMDLs, WLAs, & LAs in tributaries and upstream reaches will result in achievement of instream water quality targets for E. coli. Future monitoring activities should be representative of all seasons and a full range of flow and meteorological conditions. Monitoring activities should also be adequate to assess water quality using the 30-day geometric mean standard. For individual monitoring locations, where historical E. coli data are greater than 1000 colonies/100 mL (e.g. DRY000.2SU in Table B-1) or future samples are anticipated to be, a 1:100 dilution should be performed as described in Protocol A of the *Quality System Standard Operating Procedure for Chemical and Bacteriological Sampling of Surface Water* (TDEC, 2004b).

Tennessee's watershed management approach specifies a five-year cycle for planning and assessment. Each watershed will be examined (or re-examined) on a rotating basis. Generally, in years two and three of the five-year cycle, water quality data are collected in support of water quality assessment (including TMDL development) and planning activities. Therefore, a watershed TMDL is developed one to two years prior to commencement of the next cycle's monitoring period.

As mentioned in Section 2.0, monitoring data were not available for either the Tennessee portion of Little Creek or Booher Creek (06010102237_0100). Additional monitoring is recommended to allow for either development of a TMDL or delisting for both of these waterbodies.

For all other impaired waterbodies, additional monitoring and assessment activities are recommended only to verify reduction of pollutant loading as a result of implementation of appropriate BMPs within the subwatershed.

Example Best Management Practices (BMPs) for Agricultural Source reduction. Actual BMPs applied may vary.

9.5 Source Identification

An important aspect of pathogen load reduction activities is the accurate identification of the actual sources of pollution. In cases where the sources of pathogen impairment are not readily apparent, Microbial Source Tracking (MST) is one approach to determining the sources of fecal pollution and pathogens affecting a waterbody. Those methods that use bacteria as target organisms are also known as Bacterial Source Tracking (BST) methods. This technology is recommended for source identification in pathogen impaired waterbodies.

Bacterial Source Tracking is a collective term used for various emerging biochemical, chemical, and molecular methods that have been developed to distinguish sources of human and non-human fecal pollution in environmental samples (Shah, 2004). In general, these methods rely on genotypic (also known as "genetic fingerprinting"), or phenotypic (relating to the physical characteristics of an organism) distinctions between the bacteria of different sources. Three primary genotypic techniques are available for BST: ribotyping, pulsed field gel electrophoresis (PFGE), and polymerase chain reaction (PCR). Phenotypic techniques generally involve an antibiotic resistance analysis (Hyer, 2004).

The USEPA has published a fact sheet that discusses BST methods and presents examples of BST application to TMDL development and implementation (USEPA, 2002b). Various BST projects and descriptions of the application of BST techniques used to guide implementation of effective BMPs to remove or reduce fecal contamination are presented. The fact sheet can be found on the following EPA website: http://www.epa.gov/owm/mtb/bacsortk.pdf.

A multi-disciplinary group of researchers is developing and testing a series of different microbial assay methods based on real-time PCR to detect fecal bacterial concentrations and host sources in water samples (McKay, 2005). The assays have been used in a study of fecal contamination and have proven useful in identification of areas where cattle represent a significant fecal input and in development of BMPs. It is expected that these types of assays could have broad applications in monitoring fecal impacts from Animal Feeding Operations, as well as from wildlife and human sources. Other BST projects have been conducted or are currently in progress throughout the state of Tennessee, as presented in sessions of the Thirteenth Tennessee Water Resources Symposium (Lawrence, 2003) and the Fifteenth Tennessee Water Resources Symposium (Bailey, 2005; Baldwin, 2005; Farmer, 2005).

9.6 Evaluation of TMDL Implementation Effectiveness

The effectiveness of the TMDL will be assessed within the context of the State's rotating watershed management approach. Watershed monitoring and assessment activities will provide information by which the effectiveness of pathogen loading reduction measures can be evaluated. Additional monitoring data, ground-truthing activities, and bacterial source identification actions are recommended to enable implementation of particular types of BMPs to be directed to specific areas in impaired subwatersheds. This will optimize utilization of resources to achieve maximum reductions in pathogen loading. These TMDLs will be re-evaluated during subsequent watershed cycles and revised as required to assure attainment of applicable water quality standards.

10.0 PUBLIC PARTICIPATION

In accordance with 40 CFR §130.7, the proposed pathogen TMDLs for the South Fork Holston River Watershed will be placed on Public Notice for a 35-day period and comments solicited. Steps that will be taken in this regard include:

- Notice of the proposed TMDLs will be posted on the Tennessee Department of Environment and Conservation website. The announcement will invite public and stakeholder comment and provide a link to a downloadable version of the TMDL document.
- 2) Notice of the availability of the proposed TMDLs (similar to the website announcement) will be included in one of the NPDES permit Public Notice mailings which is sent to approximately 90 interested persons or groups who have requested this information.
- Letters will be sent to WWTFs located in E. coli-impaired subwatersheds or drainage areas in the South Fork Holston River Watershed, permitted to discharge treated effluent containing pathogens, advising them of the proposed TMDLs and their availability on the TDEC website. The letters will also state that a copy of the draft TMDL document would be provided on request. A letter will be sent to the following facilities:

Akard Elementary School (TN0025178)
Misty Waters Homeowners Association (TN0056669)
Weaver Elementary School (TN0025186)
Bristol STP #2 (TN0023531)

4) A draft copy of the proposed TMDL will be sent to those MS4s that are wholly or partially located in pathogen-impaired subwatersheds. A draft copy will be sent to the following entities:

City of Bluff City (TNS077780)
City of Bristol, Tennessee (TNS075183)
Carter County, Tennessee (TNS075124)
City of Kingsport, Tennessee (TNS075388)
Sullivan County, Tennessee (TNS075671)
Tennessee Dept. of Transportation (TNS077585)

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5) A letter will be sent to water quality partners in the South Fork Holston River Watershed advising them of the proposed E. coli TMDLs and their availability on the TDEC website. The letter will also state that a written copy of the draft TMDL document will be provided upon request. A letter will be sent to the following partners:

Natural Resources Conservation Service
Tennessee Valley Authority
United States Forest Service
Tennessee Department of Agriculture
Tennessee Wildlife Resources Agency
Virginia Department of Environmental Quality
Friends of South Fork Holston River (Va.)
Kingsport Citizens for a Cleaner Environment
Tennessee Eastman Hiking & Canoeing Club
Holston River Watershed Alliance
Kingsport Tomorrow
Boone Watershed Partnership
Friends of Fort Patrick Henry
Johnson County Stream Watch
The Nature Conservancy

11.0 FURTHER INFORMATION

Further information concerning Tennessee's TMDL program can be found on the Internet at the Tennessee Department of Environment and Conservation website:

http://www.state.tn.us/environment/wpc/tmdl/

Technical questions regarding this TMDL should be directed to the following members of the Division of Water Pollution Control staff:

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